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14 Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 UNITED STATES DISTRICT COURT

17 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 SAI KEUNG TIN,
aka "SK Tin,"
22 aka "Ricky Tin,"
23 aka "Ji Yearlong,"

24 Defendant.

No. 2:24-CR-00161-JLS

JOINT FACTUAL STATEMENT

25
26 Plaintiff United States of America, by and through its counsel
27 of record, the United States Attorney for the Central District of
28 California, Assistant United States Attorney Dennis Mitchell, and

Department of Justice Environmental Crimes Section Trial Attorneys
Ryan Connors and Lauren Steele, and Richard Goldman, counsel for the
defendant, jointly submit this factual statement as the basis for
the defendant's anticipated guilty plea to the indictment.

At all times relevant to these charges:

1. Defendant SAI KEUNG TIN, also known as ("aka") "SK Tin,"
aka "Ricky Tin," aka "Ji Yearlong," was a citizen of the People's
Republic of China and resident of Hong Kong.

2. The eastern box turtle was listed in Appendix II of the
Convention on International Trade in Endangered Species of Wild
Flora and Fauna ("CITES"). United States laws and regulations
required that individuals: obtain a CITES export or re-export
permit; file a declaration with U.S. Fish and Wildlife Service
("USFWS"); accurately label the package; and present the turtles to
the USFWS for inspection prior to export.

3. On or about June 22, 2023, the defendant knowingly
exported and sent, and aided and abetted the exporting and sending,
of a package containing 12 eastern box turtles from Los Angeles
County to his residence in Hong Kong. The defendant knew the export
was fraudulent and contrary to law in that it did not contain the
required CITES permit, declaration, or accurate label and was not
presented for inspection.

4. On or about June 22, 2023, the defendant knowingly
exported and sent, and aided and abetted the exporting and sending,
of a second package containing 12 eastern box turtles from Los
Angeles County to his residence in Hong Kong. The defendant knew the
export was fraudulent and contrary to law in that it did not contain

1 the required CITES permit, declaration, or accurate label and was
2 not presented for inspection.

3 5. On or about June 24, 2023, the defendant knowingly
4 exported and sent, and aided and abetted the exporting and sending,
5 of a package containing eight eastern box turtles from Los Angeles
6 County to his residence in Hong Kong. The defendant knew the export
7 was fraudulent and contrary to law in that it did not contain the
8 required CITES permit, declaration, or accurate label and was not
9 presented for inspection.

10 6. On or about June 24, 2023, the defendant knowingly
11 exported and sent, and aided and abetted the exporting and sending,
12 of a second package containing eight eastern box turtles from Los
13 Angeles County to his residence in Hong Kong. The defendant knew the
14 export was fraudulent and contrary to law in that it did not contain
15 the required CITES permit, declaration, or accurate label and was
16 not presented for inspection.

Dated: October 2, 2024

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

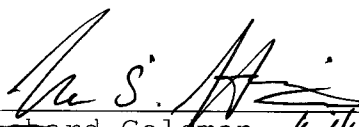
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/s/

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Senior Trial Attorney
Lauren Steele
Trial Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA


~~Richard Coleman~~ William S. Harris
Attorney for Defendant
Sai Keung Tin

11/21/2024
Date


Sai Keung Tin
Defendant

21 NOV, 2024
Date

CERTIFICATION OF INTERPRETER

I, Yanyan Liu, am fluent in the written and spoken English and Cantonese languages. I accurately translated this entire agreement from English into Cantonese to defendant Sai Keung Tin on this date.


Interpreter Name

11/21/2024
Date